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U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTA

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MAY 21 2020  
U.S. DISTRICT COURT MPLS

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Tony Terrell Robinson,

Court File No. 17-CV-0437 (DSD/KMM)

Plaintiff,

v.

Minnesota Department of Corrections, et  
al.

**DEFENDANT STEPHEN  
DANNEWITZ, M.D.'S  
SUPPLEMENTAL ANSWERS TO  
PLAINTIFF'S INTERROGATORIES**

Defendants.

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TO: Plaintiff Tony Terrell Robinson, Inmate ID: 18099-041, Federal Correction  
Institution – Greenville, P.O. Box 5000, Greenville, IL 62246-5000.

PLEASE TAKE NOTICE that Defendant Stephen Dannewitz, M.D., pursuant to  
Rule 33 of the Federal Rules of Civil Procedure, provides the following answers to Plaintiff  
Tony Terrell Robinson's First Set of Interrogatories.

**GENERAL OBJECTIONS**

Defendant Stephen Dannewitz, M.D., objects to Plaintiff's Interrogatories to the  
extent they fail to comply with Minn. Stat. § 604.11. Subject to and without waiving said  
objection, Dr. Dannewitz responds to Plaintiff's First Set of Interrogatories as follows:

**Interrogatory No. 1:** Please state whether Dr. Dannewitz's insurance carrier has  
ever paid a claim for Dr. Dannewitz, before.

**ANSWER:** This interrogatory is objected to as irrelevant, overly broad, and not  
likely to lead to the discovery of admissible evidence.

**SUPPLEMENTAL ANSWER:** Subject to and without waiving the stated objections  
above, in response to Plaintiff's letter dated March 8, 2020, limiting the scope of  
Interrogatory No. 1 to "claim" to mean, medical malpractice or deliberate

indifference for a time period limited from 2011 to present,” Dr. Dannewitz’s insurance carrier has not paid such claim.

**Interrogatory No. 2:** Please state whether Dr. Dannewitz has ever been a party to any previous claim in any action?

**ANSWER:** This interrogatory is objected to as irrelevant, overly broad, and not likely to lead to the discovery of admissible evidence. Subject to and without waiving said objections, no.

**SUPPLEMENTAL ANSWER:** Subject to and without waiving the stated objections above, in response to Plaintiff’s letter dated March 8, 2020, limiting the scope of Interrogatory No. 2 to “‘claim’ to mean, ‘any malpractice or deliberate indifference of inmates,’” Dr. Dannewitz has not been a party to a previous claim as defined by Plaintiff.

a. If so, for what type of claim

**ANSWER:** No response is required.

**SUPPLEMENTAL ANSWER:** See supplemental answer to Interrogatory No. 2.

b. If so, from what court, and under what case number

**ANSWER:** No response is required.

**SUPPLEMENTAL ANSWER:** See supplemental answer to Interrogatory No. 2.

**Interrogatory No. 5:** Please state whether Dr. Dannewitz had the authority to request or place a medical hold on Tony Terrell Robinson?

**ANSWER:** This interrogatory is objected to as vague and ambiguous as to what is meant by “medical hold” and therefore Defendant cannot respond as to whether he “had the authority to request or place a medical hold on Tony Terrell Robinson.”

**SUPPLEMENTAL ANSWER:** This interrogatory is further objected to on the basis that it is not reasonably related to any claim alleged by Plaintiff specific to Dr. Dannewitz and the assertions of purported medical negligence, deliberate indifference to medical needs, and negligent and/or intentional infliction of emotional distress.

Subject to and without waiving the stated objections above, in response to Plaintiff’s letter dated March 8, 2020, which defines medical hold as “to mean the restricting of an inmate from leaving the custody of the Department of Corrections,” Dr. Dannewitz

did not have the authority to request or place a medical hold on Tony Terrell Robinson.

- a. If not, who had the authority to do so?

**ANSWER:** See response to Interrogatory No. 5.

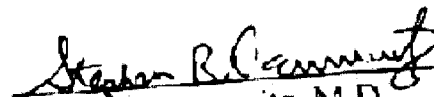
**SUPPLEMENTAL ANSWER:** See supplemental response to Interrogatory No. 5.

- b. If so, why he did not use his authority to do so?

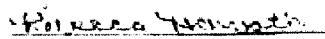
**ANSWER:** See response to Interrogatory No. 5.

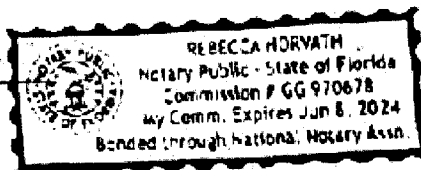
**SUPPLEMENTAL ANSWER:** See supplemental responses to Interrogatory No. 5.

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Stephen Dannewitz, M.D.

Subscribed and sworn to before me  
This 13th day of April, 2020

  
Notary  
Expiration: 06/08/2024



AS TO FORM AND OBJECTIONS:

Dated: April 13, 2020

By: 

Nicole L. Brand (#299546)

Besse H. McDonald (#0398662)

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